
The EDI

Wave

Riding the Wave



Issue 13

July 2001

Trading Partner Stats

Just a quick look at our Trading Partner Stats. Our TPs account for approximately 43 percent of our hazardous waste business (based on Task Orders (TO) issued from October 1, 2000 through June 30, 2001). For these months, we issued 4,585 TOs via EDI. A breakout is as follows: Safety-Kleen - 715; Perma-Fix (GS) - 703; AES - 194; Philip -

146; ATI - 128; GNI - 47; and MKM - 26; and EETCO - 8.

New Web Address

Our DRMS EDI Users Guide and the Implementation Conventions for our 4010 transactions are now located at the following address on the Web: http://www.drms.dla.mil/newproc/html/electronic_data_interchange.html.

Looking for a Test Partner

(by Cathy Bednar)

We are ready to test with our TPs our Version 4010 Task Orders Modifications (860s). We have functionally tested these and would now like to send an 860 to a TP and then receive an 865 back. This transaction set will be in production HWBOSS the month of October. If you are interested, please contact Cathy Bednar at 616-961-7309 or email at cbednar@mail.drms.dla.mil.

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Menu of Services

(by Cathy Bednar)

At this time, contracting is able to email our HW contractors their task order and task order modifications. Currently, the task order is also sent via EDI to our TPs. In October 2001, our TPs will have the ability to receive modifications via EDI, also. The DRMS EDI team is looking into various options to increase our menu of services for getting our data to the hazardous waste contractor electronically (other than EDI). We would like any input you are able to offer on how we can improve our services.

In addition, we are also exploring the use of the Web for the entry of manifest tracking information. We hope that in the near future our HW contractors will have the capability of entering data directly into our HWBOSS system.

Information will be forthcoming in the future in regards to all services we hope to provide.

EPA Burden Reduction Modification of the Hazardous Waste Manifest System

(by Randy Smith)

On May 22nd, 2001 EPA proposed rulemaking in the Federal Register to completely revise hazardous waste manifesting. Automated reporting, acceptance of electronic data storage, digital signatures, and waste code hierarchy are just a few examples of the proposed changes addressed below.

A Brief History

Automated manifesting of hazardous waste (HW) and standardizing the uniform hazardous waste manifest have been in development for several years. EPA developed an Electronic Data Interchange (EDI) 856 Implementation Convention (IC) transaction set several between 1990 and 1995. In 1995, DRMS with the assistance of the Logistics Management Institute (LMI) reviewed the 856 and recommended several changes through the Logistics Functional Working Group (LFWG). Our goal is to have our hazardous waste contractors send manifest data via EDI for cradle-to-grave tracking of hazardous waste and to automate the payment process. EPA reviewed and concurred on the changes prior to LFWG approval. The LFWG approved the 856 IC in 1997. EPA then successfully tested EDI transaction sets with volunteers from the commercial sector.

Approval of an EDI file format for the manifest required was only the first step of the process. A printed form acceptable throughout the US required coordination with state regulators. Several states print their own manifest forms and the fee charged for obtaining manifests assists in funding their environmental quality offices. The bulk of the new 80 page proposed rulemaking has little to do with EDI procedures, instead the rule clarifies State concerns and needs to create a truly "uniform" printed manifest. Therefore, this rule impacts the entire hazardous waste community, whether or not a company or agency decides to implement automated manifest reporting to EPA.

Manifesting via EDI

The core of the rulemaking is to allow manifesting waste electronically and provide reporting in an automated fashion. EPA estimates millions of dollars in annual hazardous waste industry savings. The goal is to have generators, transporters and facilities all online. Should a spill occur, emergency responders would have real time access to information on the hazards of the product without having to attempt to retrieve the manifest from inside the cab of a truck, a potentially lethal hot zone.

EPA Burden Reduction (cont'd)

The generator will characterize the waste, create the initial manifest using their local database system or a web-based EPA system. The manifest would then be sent to the transporter, the facility, and to a central manifest data warehouse accessible by EPA and state regulators. If the transporter is not EDI capable, the generator would print and sign a paper manifest acceptable in all states to give to the transporter. New requirements specifically for EDI transmittal include a contractor for development of the centralized manifest data warehouse and digital signature software.

A third-party security vendor would review manifest databases to ensure that manifest workflow and chain of custody meet EPA requirements. DoD already has similar requirements for all our databases. Third party security vendor for DoD manifests would be redundant and be more of a security risk than help, therefore EPA should allow a DoD waiver from this requirement.

Manifest Tracking Number

Under the proposed rule, both the optional EPA manifest document number and the State manifest number fields are eliminated and replaced with a unique twelve-digit Manifest Tracking Number. Manifest databases will need to be modified to reflect the new structure. Manifest printers/web sites will have to register with EPA and will be given a three-digit code that will be the first three characters of the manifest tracking number. It is unclear if “unique” means the number can’t repeat for three years that records have to be kept or can’t ever repeat. If the latter is desired, twelve characters may not meet the long-term need. Many stakeholders (including DRMS) store manifest indefinitely to reduce CERCLA liability. States that receive income by charging a fee for printing manifests will need to find a new revenue stream.

Elimination of Fields

State Manifest Document Number, State Generator’s ID, State Transporter’s ID, Transporter’s Phone, State Transporter’s ID, Transporters Phone, State Facility’s ID, Facility’s Phone and Additional Descriptions fields have been eliminated from the manifest in the proposed rule. The Additional Descriptions field is being merged with the Special Handling Instructions field to create an Additional Descriptions and Special Handling Instructions field.

Third Party Preparer Signature

There are several proposed modifications that are indirectly related or not related to manifesting via EDI. The new EDI manifest and uniform printed form both allow a third party preparer to sign the manifest, acknowledging the role hazardous waste contractors play in arranging for disposal.

Unmanifested, Residue, and Rejected Waste

Facilities will no longer have to submit an EPA form 8700-13B for unmanifested waste, they will be able to submit a typed, handwritten, or email note within 15 days. Residue and rejected waste will have a new field that identifies them as such on the manifest. The facility will make a note on the original manifest on what items were rejected, but the rejected waste will leave the facility on a new manifest. The original manifest tracking number will be referenced in the new manifest under the additional descriptions and special handling field.

Waste Code Hierarchy

EPA waste codes will be listed in order, based on the following hierarchy: ignitable or reactive, P-listed waste or acutely hazardous F-listed waste, U-listed waste, K-listed waste, non-acutely hazardous F-listed waste, then all other D-characteristic wastes. If required, State waste codes are to be entered for the generation State, the facility

EPA Burden Reduction (cont'd)

State, or both in it's own section of the new manifest. Many hazardous waste software databases will require modification as they currently list in alphabetical order and will now have to sequence waste numbers.

This new requirement is actually less stringent than EPA's original proposal. Prior to OMB review, the proposed rule stated that within each group, wastes be listed in order of the amount of contaminant. EPA dropped the more stringent requirement after stakeholders (including DoD and DRMS) expressed concerns that costs would be greater than EDI savings. Containers would have to be individually sampled to determine waste code hierarchy if the waste profile indicated that two or more codes were similar in the range of concentration.

Biennial Report Management Codes

EPA proposes dropping the use of handling codes (40 CFR 264/5, appendix I, table 2) and replacing with the Biennial Report Management Codes (see appendix I for new 2001 codes) EPA believes this will save generators time in creating the Biennial report and make the manifest consistent with the Biennial report. Current manifest database will require modification to meet this requirement.

There are several flaws to this proposal:

1. At time of shipment, waste contractors will repackage, consolidate, and fill void spaces with inert material for disposal. Volume and quantity of waste generated may not exactly equal volume and quantity of waste manifested.
2. Facilities are still permitted using handling codes. EPA has just moved the problem from generators to facilities. Currently, generators receive handling codes from facilities and have to convert them to management codes on the Biennial report. Under the proposed rule, facilities will have to convert the handling codes on their permit to the Biennial Report management codes. A more streamlined rule would change management codes for permitting under 40 CFR 264/5 so that generators and facilities are using the same codes.
3. EPA has added confusion by publishing obsolete 1999 Biennial Report system codes in the proposed rule instead of the 2001 RCRA Biennial Report Management Code (FR Vol. 65, No. 122/ Friday, June 23, 2000 Notices, Page 39142). EPA does include the following statement "When the list of system type codes change in the Biennial Report instructions, 40 CFR 262, Appendix 2 would also be changed." Unfortunately, a good percentage of stakeholders may miss this statement and inadvertently use the wrong codes. Hopefully, EPA will use the new 2001 codes in their final rule.

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EPA Burden Reduction (cont'd)

Conversion Chart

Handling Codes (40 CFR 264/5 App. 1 Table 2) to Management Codes (FR Vol. 65, No. 122/ Friday, June 23, 2000 Notices, Page 39142)

Handl. Code	Mgt. Code
D79	H134
D80	H132
D81	H131
D82	H135
D83	H132
D99	H129
S01	H141
S02	H141
S03	H141
S04	H141
S05	H141
S06	H141
S99	H141
T06	H040
T07	H040
T08	H040
T09	H040
T10	H040
T11	H040
T12	H040
T13	H040
T14	H040
T15	H040
T16	H040
T17	H040
T18	H040
T19	H103

Handl. Code	Mgt. Code
T20	H103
T21	H111
T22	H075
T23	H077
T24	H071
T25	H129
T26	H129
T27	H073
T28	H129
T29	H129
T30	H129
T31	H121
T32	H129
T33	H129
T34	H129
T35	H129
T36	H123
T37	H129
T38	H124
T39	H112
T40	H124
T41	H129
T42	H129
T43	H129
T44	H123
T45	H101
T46	H124

Handl. Code	Mgt. Code
T47	H129
T48	H103
T49	H124
T50	H061
T51	H129
T52	H129
T53	H129
T54	H020
T55	H129
T56	H129
T57	H122
T58	H010
T59	H129
T60	H129
T61	H129
T62	H129
T63	H020
T64	H083
T65	H124
T66	H129
T67	H081
T68	H081
T69	H081
T70	H081
T71	H081
T72	H081
T73	H131

Handl. Code	Mgt. Code
T74	H081
T75	H081
T76	H081
T77	H081
T78	H081
T79	H081
T80	H050
T81	H050
T82	H050
T83	H050
T84	H050
T85	H050
T86	H050
T87	H010
T88	H010
T89	H010
T90	H010
T91	H010
T92	H010
T93	H010
T94	H129
X01	H040
X02	H129
X03	H040
X04	H129
X99	H129

Offsite Manifest Data Storage

EPA has eliminated the requirement to store paper copies of the manifest onsite for three years and allows manifest information storage outside the physical location of the generator so long as regulators are allowed access to the information. This change was required to allow generators to input manifest data into a central EPA sponsored web site to create the EDI transaction set. The benefits are far reaching beyond this purpose. A large activity such as DRMS can now keep data at a central server and remain in compliance. A hazardous waste software developer can provide manifest services on the web to several DoD and private clients without having to worry about software releases and upgrades to client sites.

EPA Burden Reduction (cont'd)

EPA did not change 40 CFR 264/265.73 to allow the same flexibility with the operating log. Since the manifest is used to document removal of waste from the operating log, they both need to be stored off-site. The operating log data is safer kept off site in the case of spill or release, it would not be damaged and more likely to be available to hazardous material responders. If the operating log is not allowed off-site, manifest databases will have to develop interfaces to transfer information to the operating log.

Effective Date of Rule

The effective date of the proposed rule is six months after promulgation of the final rule with a two-month grace period to use the old paper manifests. States will have to approve the new manifesting process in a procedure similar to how the universal waste rules were adopted. Stakeholders must adopt the entire rule if they wish to utilize the new manifest form during the two-year grace period. If the new manifest is used, the waste code hierarchy is required, management codes are required, and the manifest tracking number is required. A thirty-month grace period may not be enough time for stakeholder databases to be modified to meet the new requirement. Now is the time to submit systems change requests to your development office!

Reference Information:

Federal Register, Vol. 66, No. 99, Tuesday, May 22, 2001, Proposed Rules, pp. 28240-28318

DRMS Environmental Program Web Site: <http://www.drms.dla.mil/newenv/index.html>

DRMS Procurement EDI Web Site: http://www.drms.dla.mil/newproc/html/electronic_data_interchange.html

Cleveland Electronic Commerce Resource Center: <http://www.ecrc.camp.org/>

EPA Office of Solid Waste EDI Manifest Pilot: <http://www.epa.gov/epaoswer/hazwaste/gener/manifest/>

EPA Office of Solid Waste 2001 Biennial Report Instructions: <http://www.epa.gov/epaoswer/hazwaste/data/brs01/forms.htm>

Moving to Commercial/Industry Payment Process

(by Steve Sprague)

The hazardous waste (HW) contracting shop, in conjunction with the environmental office, is looking to change the HW payment process to be more consistent with commercial practices. The tentative start date for this change is October 15, 2001. What this means to you is this: the contractors may submit acceptance documentation to DRMS once the return shipping documentation is received from the initial TSDF.

The reasons for the change are as follows:

1. Reduce performance risk (cash flow and focused tracking)
2. Increase competition on our HW solicitations
3. Reduce cost to generator while still providing cradle-to-grave tracking
4. Reduce DRMS cost

The current HW tracking and payment process can take an average of 160 to 180 days. With the change, payment should be within 90-100 days.

The documentation required will be set up in a two-phase approach. For the first phase, contractors will submit acceptance documentation. For phase two, contractors will submit final disposal documentation.

Moving to Commercial/Industry Payment Process (cont'd)

Below is a draft of the new DRMS Form 1683-1 (though this is one form, for this example, it has been separated into two tables).

Draft Phase I						
Line #	BOSS Doc #	HIN #	Pickup Mnfst #	Qty Picked Up	Initial TSDF Receipt Date	Initial TSDF Handling Codes
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

Draft Phase II							
Line#	Interim/ Disposal Manifest No.	Interim/ Disposal Facility EPA No.	Waste Code	Treatment/ Disposal Codes	Qty Disposed	Interim/ Disposal TSDF Accept Date	Disposal Date (PCBs Only)
1							
2							
3							
4							
5							
6							
7							
8							
9							

Moving to Commercial/Industry Payment Process (cont'd)

In Phase I, the acceptance documentation consists of the following: One 1683-1 per task order; all line items must be in order and cover the entire order; contractors must complete through Column 7 (first table above); all return shipping papers signed by receiving TSDF; and the acceptance of the 6000 series CLINs will be handled separately on a case by case basis.

In Phase II, the disposal documentation consists of: One 1683-1 per task order; all line item numbers in order; and complete columns 8 through 14 (Table II above). Disposal documentation timeframe is 300 days after issuance of task order.

The tracking report will be by contract and at three month intervals. Each report will have a rating consistent with overall performance report card. A sample tracking report is below:

Draft Tracking Report	
# RCRA Violations _____	_____ %
# Lines not Submitted within Set Timeframes _____	_____ %
# of Required Recycled Lines not Recycled _____	_____ %
# of Lines Sent to Non-DRMS Facilities _____	_____ %
Other _____	

DRAFT OVERALL TRACKING REPORT

Firm _____

Contract _____

Three Month Rating

January – March

GOOD	FAIR					
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- A. RCRA Violations
- B. Percentage of lines submitted for tracking within contractual timeframes
- C. Percentage of lines requiring recycling not recycled
- D. Percentage of lines sent to non-DRMS facilities
- E. Other – i.e., loss of Audit Trail

Jan – Mar Apr-June Jul-Sep Oct-Dec Jan-Mar

A. NONE	NONE			
B. FAIR	GOOD			
C. FAIR	GOOD			
D. EXCELLENT	FAIR			
E. NONE	NONE			

Moving to Commercial/Industry Payment Process (cont'd)

For current contracts (October 15), the change will kick in for all line items less than one year old. We will provide a two and a half month processing window to January 1, 2002. After one year, lines will be considered late and will be subject to consideration or termination. For those greater than one year on January 1, 2002 (Line items issued before October 15, 2000), contractors are required to submit the modified 1683-1 for acceptance. For line items greater than two years, consideration may be taken. These lines require the modified 1683-1 with applicable documentation. After January 1, 2002, line items greater than two years will be closed out and high risk items pursued. This may require negotiation on a case-by-case basis.

For further information, please contact the contract specialist assigned to your contracts.

Communication

Communication is vitally important to the success of EDI. Please let one of the POCs listed below know if you are experiencing any problems with your EDI transmissions. We are here to help you in any way we can. We are always interested in receiving your opinion and input. Please submit your questions, concerns or ideas to one of the POCs listed below. We are here to work with the Trading Partners so that all can "Ride the Wave". Hope to hear from you. Let's keep the lines of communication open. Please note that Sheryl Woods is no longer an EDI POC. She has left the policy office to work as a Contract Specialist in DRMS-POB.

Cathy Bednar, (616) 961-7309 (cbednar@mail.drms.dla.mil)

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